Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

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General Information

Name:	Cooper Tire & Rubber Company
Address:	250 Oak Grove Drive, Mount Sterling, Kentucky
Date application received:	July 10, 1997
Main SIC/Source description:	3052/Rubber and Plastics Hose and Belting Plant
AFS(10-digit) Plant ID:	21-173-00030
EIS #:	103-2860-0030
Finds #:	KY0001998194
Application log number:	F275
Permit number:	V-97-026

Application Type/Permit Activity

[ ] Initial issuance
[X] Permit modification
__Administrative
__Minor
X Significant
[ ] Permit renewal
[ ] General permit
[ ] Conditional major
[X] Title V
[X] Synthetic minor
[ ] Operating
[X] Construction/Operating

Note: F275 is for addition of two additional production lines SN-24 and SN-25 and substitution of a 9.21 MMBtu/hr boiler that was never installed with a 6 MMBtu/hr boiler.

Compliance Summary

[ ] Source is out of compliance
[X] Compliance certification signed
[ ] Compliance schedule included

Applicable Requirements list

[ ] NSR
[ ] PSD
[ ] NSPS
[ ] NESHAPS
[X] SIP
[X] Other (State Air Toxics)

Miscellaneous

[ ] Acid rain source
[X] Source may be subject to 112(r)
[X] Source applied for federally enforceable emissions cap
[ ] Source provided terms for alternative operating scenarios
[ ] Source subject to a MACT standard
[ ] Source requested case-by-case 112(g) or (j) determination
[ ] Application proposes new control technology
[X] Certified by responsible official
[X] Diagrams or drawings included
[ ] Confidential business information (CBI) submitted in application
[ ] Class I area impacts
[ ] Area is non-attainment for:

Emissions Summary:
Emissions shown are for log F275 project, with a new boiler point 03, 6 MMBtu/hr to be installed instead of a previous 9.21 MMBtu/hr boiler, and for two new lines points 24 and 25, dual durometer line #1 and cascade line #1.

Pollutant	Actual (tpy)	Potential (tpy)
PM_{10}	0.53	0.53
SO_2	0.04	0.04
NOx	3.95	3.95
CO	1.11	1.11
VOC	37.00	37.00
LEAD	NA	NA
HAP $\geq$ 10 tpy (by CAS)	Note: single HAPs each < 10 TPY for the project F275	
Carbon disulfide (75-15-0)	5.13	5.13

Note 1: For boiler at point 03, emissions are shown for the 6 MMBtu/hr boiler when firing the primary fuel natural gas. The backup fuel is secondary and is number two fuel. This boiler is to be installed in place of the 9.21 MMBtu/hr boiler.

Note 2: Additional Hazardous Air Pollutants subject to Kentucky State Air Toxics Requirements are shown on the permit with a pound(s) per hour limit.

Note 3. Additional HAPs below 10 tons per year potential emissions for single ones are not shown. Carbon disulfide emissions for the F275 project are the most significant.

Source Process Description:

The two new lines proposed in this application, the dual durometer line #1, emission point 24 (SN-24), and the cascade line #1, emission point 25 (SN-25), involve a sequence of operations on a strip of material that moves continuously down a line. Main operations include rubber extrusion and curing, coating application and curing, then cooling and cutting operations. The company has included two process flow diagrams in application (log F275) to be referenced for specific identification of each step in the process.

Note that emission points 01 through 23 (SN-1 through SN-23) have been previously permitted with the required public, affected states, and EPA notification and review procedures, and the resulting permit F-95-016 is therefore federally enforceable.

Emission and Operating Caps description:

For the proposed construction (log F275) potential volatile organic compound emissions are approximately 37 tons per year, continuous. Hazardous Air Pollutants potential emissions (continuous) are approximately 11 tons per year. PM_{10} potential emission (continuous) is 0.18 ton per year.

The annual emissions cap for volatile organic compounds is being increased from 130 tons per year to 225 tons per year; therefore a significant revision to federally enforceable permit F-95-016 is necessary. This will require the public, affected states, and EPA review procedures previously employed for points 01 through 23, and the resulting permit will be federally enforceable.

Regarding the Kentucky State Air Toxics requirements, as a result of the proposed construction and newer emission factors for previous emissions units, the carbon disulfide sourcewide allowable needs to be adjusted as shown in the permit to 56.0 pounds per hour, an increase from 10.2 pounds per hour. Carbon disulfide is expected to be emitted as a vapor and is classed as an inorganic compound. As a result of more recent company submitted emissions calculations, the trimethylbenzene allowable is being adjusted to reflect the new emissions based on more recent factors to 3.78 pounds per hour. Note that based on more recent company submitted emissions calculations, several air toxic chemicals are indicated as emitted at less than their respective adjusted significant levels. The appropriate emission limits have thus been removed from the permit.

This source has particulate emissions estimated to be less than 10 tons per year total; thus, the associated particulate emitting units are assumed to be in compliance given the throughput and operating limits of this permit.